

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN BROADCASTING  
COMPANIES, INC., DISNEY  
ENTERPRISES, INC., TWENTIETH  
CENTURY FOX FILM CORPORATION,  
CBS BROADCASTING INC., CBS STUDIOS  
INC., FOX TELEVISION STATIONS, LLC,  
FOX BROADCASTING COMPANY, LLC,  
NBCUNIVERSAL MEDIA, LLC,  
UNIVERSAL TELEVISION LLC, and OPEN  
4 BUSINESS PRODUCTIONS, LLC,

Plaintiffs,

v.

DAVID R. GOODFRIEND and SPORTS  
FANS COALITION NY, INC.,

Defendants.

No. 19-cv-7136

**JOINT STIPULATION AND [PROPOSED] ORDER  
MODIFYING CASE SCHEDULING ORDER**

Plaintiffs, American Broadcasting Companies, Inc., Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, CBS Broadcasting Inc., CBS Studios Inc., Fox Television Stations, LLC, Fox Broadcasting Company, LLC, NBCUniversal Media, LLC, Universal Television LLC, and Open 4 Business Productions, LLC (“Plaintiffs”), and Defendants, David R. Goodfriend and Sports Fans Coalition NY, Inc. (“Defendants”), by and through their counsel, respectfully submit this Joint Stipulation and Proposed Order Modifying the Scheduling Order in the above-captioned matter.

On January 31, 2020, this Court entered an initial Scheduling Order with deadlines set through the close of expert discovery on September 11, 2020. The Court also scheduled a status

conference for June 19, 2020 to assess the progress of the case and set the remaining case schedule.

The parties request a two-month extension of the deadlines set forth below because of the impact of the disruptions caused by the COVID-19 health crisis, including local government restrictions on out-of-home activities. Counsel for the parties have conferred about the effect of these circumstances upon the case's schedule. The parties request that the Court retain the June 19, 2020 status conference (telephonic or in person, as the Court directs) to assess the case's progress. This is the first time the parties have sought an extension or modification to the case schedule.

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, that the following deadlines are extended pursuant to the table below:

<b>Event</b>	<b>Current Deadline</b>	<b>New Deadline</b>
Status conference	Friday, June 19	Unchanged
Fact discovery completed	Friday, June 19	Friday, August 14
Burden-of-proof expert reports	Friday, July 17	Friday, September 11
Rebuttal expert reports	Friday, August 14	Friday, October 9
Expert discovery completed	Friday, September 11	Friday, November 6

Dated: May 12, 2020

Respectfully submitted,

/s/ Elizabeth E. Brenckman

R. David Hosp  
Elizabeth E. Brenckman  
ORRICK, HERRINGTON & SUTCLIFFE LLP  
51 West 52nd Street  
New York, NY 10019  
Tel: (617) 880-1886  
(212) 506-3535  
dhosp@orrick.com  
ebrenckman@orrick.com

Mark S. Puzella (*pro hac vice*)  
Sheryl Koval Garko (*pro hac vice*)  
222 Berkeley Street, Suite 2000  
Boston, MA 02116  
Tel: (617) 880-1896  
(617) 880-1919  
mpuzella@orrick.com  
sgarko@orrick.com

Mitchell L. Stoltz  
Electronic Frontier Foundation  
815 Eddy Street  
San Francisco, CA 94109  
Tel: (415) 436-9333  
mitch@eff.org

*Attorneys for Defendants David R. Goodfriend  
and Sports Fans Coalition NY, Inc.*

/s/ Thomas G. Hentoff

Gerson A. Zweifach  
Thomas G. Hentoff (*pro hac vice*)  
Joseph M. Terry (*pro hac vice*)  
WILLIAMS & CONNOLLY LLP  
725 Twelfth Street, N.W.  
Washington, DC. 20005

650 Fifth Avenue  
Suite 1500  
New York, NY 10019

Tel: (202) 434-5000  
gzweifach@wc.com  
thentoff@wc.com  
jterry@wc.com

*Attorneys for All Plaintiffs/Counterclaim  
Defendants*

Paul D. Clement (*pro hac vice*)  
Erin E. Murphy (*pro hac vice*)  
KIRKLAND & ELLIS LLP  
1301 Pennsylvania Avenue, NW  
Washington, DC 20004

Tel: (202) 389-5000  
paul.clement@kirkland.com  
erin.murphy@kirkland.com

*Attorneys for Plaintiffs Fox Television  
Stations, LLC and Fox Broadcasting  
Company, LLC*

On this \_\_\_\_ day of May, 2020,

Approved By:

\_\_\_\_\_  
The Honorable Louis L. Stanton  
United States District Judge